

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Civil Action No. 5:13-cv-356

Ricardo Mondragon, Eustorgio Espinobarros)
Feliciano, Juan Contreras, Cutberto Ortiz)
Hernandez, Alejandro Jimenez Gonzalez,)
Renato Romero Acuna, Jose Tapia, Anastacio)
Lopez Solis, and Abdon Quirasco Sixteco, on)
behalf of themselves and all other similarly)
situated persons,)
)
Plaintiffs,)
)
v.)
)
SCOTT FARMS, INC., ALICE H. SCOTT,)
LINWOOD H. SCOTT, JR., LINWOOD H.)
SCOTT III, DEWEY R. SCOTT, JFT)
HARVESTING, INC., JUAN F. TORRES,)
OASIS HARVESTING, INC., and RAMIRO)
B. TORRES,)
Defendants.)

JOINT MOTION FOR APPROVAL OF SETTLEMENT

Plaintiffs Ricardo Mondragon, Eustorgio Espinobarros Feliciano, Juan Contreras, Cutberto Ortiz Hernandez, Alejandro Jimenez Gonzalez, Renato Romero Acuna, Jose Tapia, Anastacio Lopez Solis, and Abdon Quirasco Sixteco (“Plaintiffs”), by and through their undersigned counsel, and Defendants JFT Harvesting, Inc., Juan F. Torres, Oasis Harvesting, Inc., and Ramiro B. Torres, (“FLC Defendants”), by and through their undersigned counsel, jointly move this Court for entry of the Order attached to this Joint Motion granting final approval of the parties’ settlement agreement (attached as Exhibit 1).

WHEREFORE, the parties respectfully request that the Court enter the proposed Order, granting final approval of the Settlement Agreement (attached as Exhibit 2), and granting the parties any other relief that the Court deems appropriate and necessary.

This the 21st day of October, 2019.

<p><u>/s/ Robert J. Willis</u> Robert J. Willis N.C. Bar No.10730 Law Office of Robert J. Willis, P.A. P.O. Box 1269 Raleigh, NC 27602 (919) 821-9031 (919) 821-1764 (fax) E-mail: rwillis@rjwillis-law.com <i>Co-Counsel for Plaintiffs and FLSA Collective Action</i></p> <p><u>/s/ Carol Brooke</u> Carol Brooke Clermont Fraser Ripley North Carolina Justice Center P.O. Box 28068 Raleigh, NC 27611-8068 (919) 856-2144 (919) 856-2175 (fax) carol@ncjustice.org clermont@ncjustice.org <i>Co-Counsel for Plaintiffs and FLSA Collective Action</i></p>	<p><u>/s/ F. Marshall Wall</u> F. Marshall Wall N. C. Bar No. 26804 E-mail: mwall@cshlaw.com Cranfill Sumner & Hartzog LLP Post Office Box 27808 Raleigh, North Carolina 27611-7808 Telephone: (919) 828-5100 Facsimile: (919) 828-2277 <i>Attorneys for Defendants Scott Farms, Inc., Alice H. Scott, Linwood H. Scott, Jr., Linwood H. Scott, III, and Dewey R. Scott</i></p> <p><u>/s/ Andrew M. Jackson</u> Andrew M. Jackson Andrew Jackson Law Post Office Box 27 Clinton, NC 28329-0027 (910) 592-4121 (910) 590-1012 (fax) andy@andrewjacksonlaw.com <i>Attorney for Defendants JFT Harvesting, Inc., Juan F. Torres, Oasis Harvesting, Inc., and Ramiro B. Torres</i></p>
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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: Robert J. Willis, Esq., Carol Brooke, Esq., Clermont Fraser, Esq., Marshall Wall, Esq., and Laura Dean, Esq.

/s/ Andrew M. Jackson

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